

**OFFICE OF THE STANDING CHAPTER 13 TRUSTEE  
6851 N.E. Loop 820, Suite 300  
North Richland Hills, TX 76180-6608  
(817) 770-8500  
Fax (817) 770-8511**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**IN RE:**

**Case No: 15-42668-RFN**

**STEPHEN DOUGLAS DURHAM  
JENNIFER LYNN DURHAM**

**Debtors,**

**Pre-Hearing Conference:  
Time & Date: 8:30 AM  
Friday, September 25, 2015**

**TRUSTEE'S OBJECTION TO CONFIRMATION**

**TO THE HONORABLE RUSSELL F NELMS, U.S. BANKRUPTCY JUDGE:**

Now comes Tim Truman, the Standing Chapter 13 Trustee, and files this his "Trustee's Objection to Confirmation" of the Plan heretofore filed herein by Debtors, and for the same would respectfully show the Court as follows:

The Debtors have failed to meet the requirements of 11 U.S.C. Section 1325(a)(9). The Trustee would show, on information and belief, that the Debtors have not filed all applicable federal, state and local tax returns as required by Section 1308 of the Bankruptcy Code. As of the date of the 341 meeting 8/19/2015, the returns for the following tax years had not been filed: **2014**. Therefore, the Trustee is unable to recommend Confirmation of the Plan.

**WHEREFORE, PREMISES CONSIDERED**, the Trustee prays that said Plan not be confirmed unless and until it has been modified to cure all objections set forth hereinabove, and for general relief.

Respectfully submitted,

By: /s/ Angela D. Allen

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Tim Truman, Bar # 20258000  
Standing Chapter 13 Trustee  
Angela Allen, Bar # 007869700  
Staff Attorney

15-42668-RFN STEPHEN DOUGLAS DURHAM & JENNIFER LYNN DURHAM

Trustee's Objection to Confirmation

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing "Trustee's Objection to Confirmation" was served on all parties listed below in the manner listed below on or before August 20, 2015

/s/ Angela D. Allen

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Tim Truman, Angela Allen

**BY FIRST CLASS MAIL:**

STEPHEN DOUGLAS DURHAM, JENNIFER LYNN DURHAM, 1910 Pin Oak Lane, Dallas, TX 75253-0000

**BY ELECTRONIC SERVICE:**

VIDA LAW FIRM PLLC, 3000 CENTRAL DR, BEDFORD, TX 76021

LINEBARGER GOGGAN BLAIR & SAMPSON LLP, 2777 N STEMMONS FWY #1000, DALLAS, TX 75207

EDDIE R JIMENEZ, 4375 JUTLAND DR #200, PO BOX 17933, SAN DIEGO, CA 92177

United States Trustee, 1100 COMMERCE STREET, ROOM 976, DALLAS, TX 75242